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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**[PROPOSED] ORDER SUSTAINING
GOOGLE'S OBJECTIONS TO PLAINTIFFS'
OPENING DEMONSTRATIVES REGARDING
DAMAGES; GRANTING GOOGLE MOTION
IN LIMINE No. 15 TO EXCLUDE EVIDENCE
OF UNTIMELY ALTERNATIVE UNJUST
ENRICHMENT CALCULATIONS**

Dept: 3, 17th Fl.
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2020
Trial Date: August 18, 2025

Before the Court is Google LLC's ("Google") Objections to Plaintiffs' Opening Demonstratives Regarding Damages and Google's Related Motion *in Limine* No. 15 to Exclude Evidence of Untimely Alternative Unjust Enrichment Calculations (the "Objections" and the "Motion"). Having considered the Objections and Motion, the Declaration of Thilini Chandrasekera filed concurrently therewith, and the exhibits attached thereto, along with other materials in the record, argument of counsel, and such other matters as the Court may consider, the Court SUSTAINS the Objections and GRANTS the Motion.

Accordingly, IT IS HEREBY ORDERED THAT:

1. Plaintiffs may not urge the jury to use a new per-month damages model;
2. Google's Motion *in Limine* No. 15 to Exclude Evidence of Untimely Alternative Unjust Enrichment Calculations is GRANTED. Plaintiffs are precluded from introducing evidence of the unjust enrichment figures from Mr. Lasinski's "alternative calculations" in his second supplemental report; and
3. Plaintiffs may not present demonstratives or argument regarding the above damages issues.

IT IS SO ORDERED.

Dated: _____

HON. RICHARD SEEBORG
United States District Judge